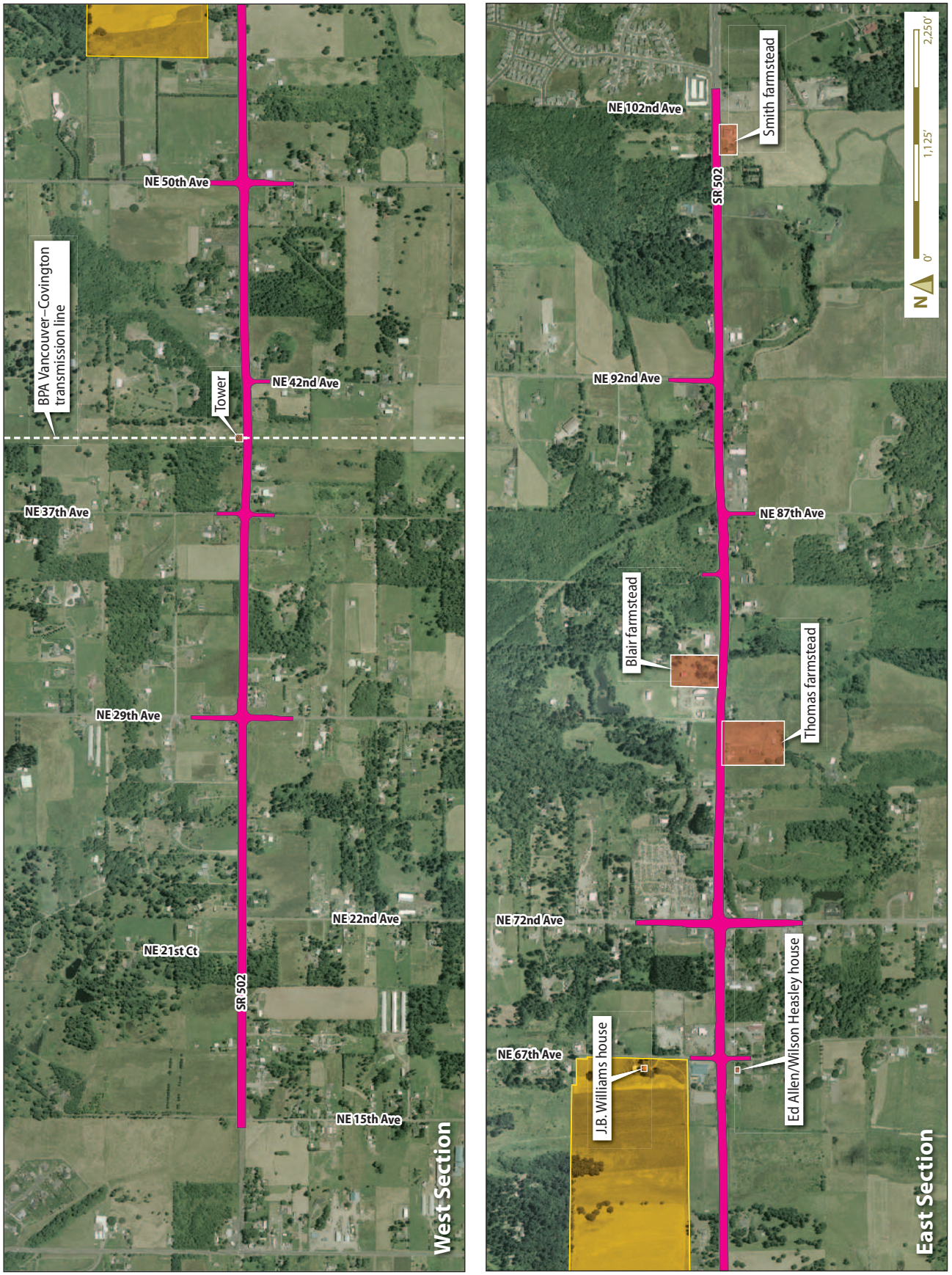

Exhibit 30: The Pink Alternative (Proposed Action) and Section 4(f) properties

through Dollars Corner with some slight curves to minimize adverse effects to the environment and the community (see Exhibit 30). Direct impacts to these properties would include:

- **J.B. Williams house:** Like the other alternatives, the property that includes the J.B. Williams house would likely be acquired as a mitigation site, likely requiring removal of the house; however, mitigation options that could relocate the house will be investigated, as discussed in Section 5.3. Acquisition of the property would change the agricultural land use to a public use as a mitigation site, restoring the historic wetland and stream function as mitigation for the project's wetland and habitat impacts.
- **Thomas farmstead:** This alternative would require removal of the house on the Thomas farmstead; however, mitigation options will include an investigation as to whether the house can be relocated, as discussed in Section 5.3. Acquisition of right of way on this property would change the agricultural land use to a transportation land use.
- **Blair farmstead:** The Pink Alternative would require acquisition of right of way along the SR 502 frontage for the Blair farmstead, removing vegetation between the roadway and the house, but not causing impacts to any structures. This right of way acquisition would result in a minor impact to the historic setting of the Blair farmstead. However, with the incorporation of all possible planning measures, this would result in only a *de minimis* impact (the Federal Highway Administration has determined and the Washington State Department of Archaeological and Historic Preservation concurred that the Proposed Action would result in No Adverse Effect under Section 106). Acquisition of right of way on this property would change the agricultural land use to a transportation land use.
- **Smith farmstead**: This alternative would require removal of the barn, which is a contributing feature to the historic farmstead; however, mitigation options will include an investigation as to whether design modifications can be made to the Proposed Action to avoid removal of the barn or whether the barn can be relocated, as discussed in Section 5.2. Vegetation between the roadway and the farmstead structures would also be removed, altering the historic setting of the farmstead. Acquisition of right of way on this property would change the agricultural land use to a transportation land use.

The Bonneville Power Administration Vancouver–Covington transmission line and the Ed Allen/Wilson Heasley house would not be affected by the Pink Alternative. The alternative also would not affect the Ed Allen/Wilson Heasley house, and therefore would avoid use of this Section 4(f) property.

The Pink Alternative would potentially change access points to properties located adjacent to SR 502 including the access to the Bonneville Power Administration Vancouver–Covington transmission line; relocation of the driveway access from SR 502 to NE 82nd Avenue for the Blair farmstead; relocation of the driveway access from SR 502 to NE 67th Avenue for the Ed Allen/Wilson Heasley house; and consolidation of driveway accesses for the remaining portion of the Thomas farmstead and Smith farmstead.

Proximity impacts that may occur to these historic properties include:

- **Air quality:** The study area is in attainment for all National Ambient Air Quality Standards criteria pollutants, so it is considered to have air quality as good as or better than specified by these standards. Modeling shows that the alternatives would not cause a violation of the applicable National Ambient Air Quality Standards, and future carbon monoxide levels along the corridor are expected to be similar to today's levels. The alternatives are not expected to have significant effects on levels of particulate matter since they would not result in substantial changes in the overall number of trips being made in the study area.
- **Visual quality:** The Pink Alternative could have visual impacts to Section 4(f) properties. Removal of the J.B. Williams house, the Thomas farmstead house, and the barn on the Smith farmstead would visually change the agricultural setting of these properties. Vegetation around the properties would also likely be altered. Similarly, road widening and removal of the vegetation along the SR 502 frontage of the Blair farmstead and the Ed Allen/Wilson Heasley house would slightly change the visual setting of these Section 4(f) properties, although the setting is not considered a significant component for the Ed Allen/Wilson Heasley house.
- **Noise:** Noise levels would be expected to increase slightly for the Ed Allen/Wilson Heasley house, the structures on the Blair farmstead, and the remaining structures on the Smith farmstead since the new roadway would be located closer than its current alignment. The other Section 4(f) properties that would potentially be affected by noise would be removed or relocated under this alternative.
- **Water quality:** Stormwater detention and treatment and wetland mitigation are proposed for any of the build alternatives, which would result in no net change of water quality for the Section 4(f) properties.

The proximity impacts of the Pink Alternative will not result in a constructive use of any of the Section 4(f) properties.

4.6 How would the Blue Off-Corridor Alternative affect Section 4(f) property?

The Blue Alternative would cause impacts to three historic properties by creating a new roadway with a 150-foot right of way for the SR 502 off-corridor, running parallel to NE 219th Street to the north (see Exhibit 31). Direct impacts to these properties would include:

- **J.B. Williams house:** Like the other alternatives, the property that includes the J.B. Williams house would likely be acquired as a mitigation site, requiring removal of the house; the new roadway would run along the northern property line of this parcel. Acquisition of the property would change the agricultural land use to a public use as a mitigation site, restoring the historic wetland and stream function as mitigation for the project's wetland and habitat impacts.
- **Blair farmstead:** The new roadway would run through the northern portion of the parcel containing the historic Blair farmstead, but it would not adversely affect the farmstead or any of its structures; however, this would slightly change the setting of the farmstead, so this would be a *de minimis* impact (if the Federal Highway Administration determined and the Washington State Department of Archaeological and Historic Preservation concurred that this is No Adverse Effect under Section 106). Acquisition of right of way on this property would change the agricultural land use to a transportation land use.
- **Smith farmstead**: This alternative would require removal of the barn, which is a contributing feature to the historic farmstead. Vegetation between the roadway and the farmstead structures would also be removed, altering the historic setting of the farmstead. Acquisition of right of way on this property would change the agricultural land use to a transportation land use.

This alternative would cross the Bonneville Power Administration Vancouver–Covington transmission line, further north than the on-corridor alternatives, but would not cause removal or relocation of any towers and therefore would not have any impacts. The Ed Allen/Wilson Heasley house and the Thomas farmstead would not be affected by this alternative, and therefore this alternative would avoid use of these Section 4(f) properties.

The Blue Alternative would consolidate driveway accesses for the remaining portion of the Smith farmstead. It would not change access for any of the other Section 4(f) properties, as none of their existing access points intersect the proposed alignment.

Proximity impacts that may occur to these historic properties include:

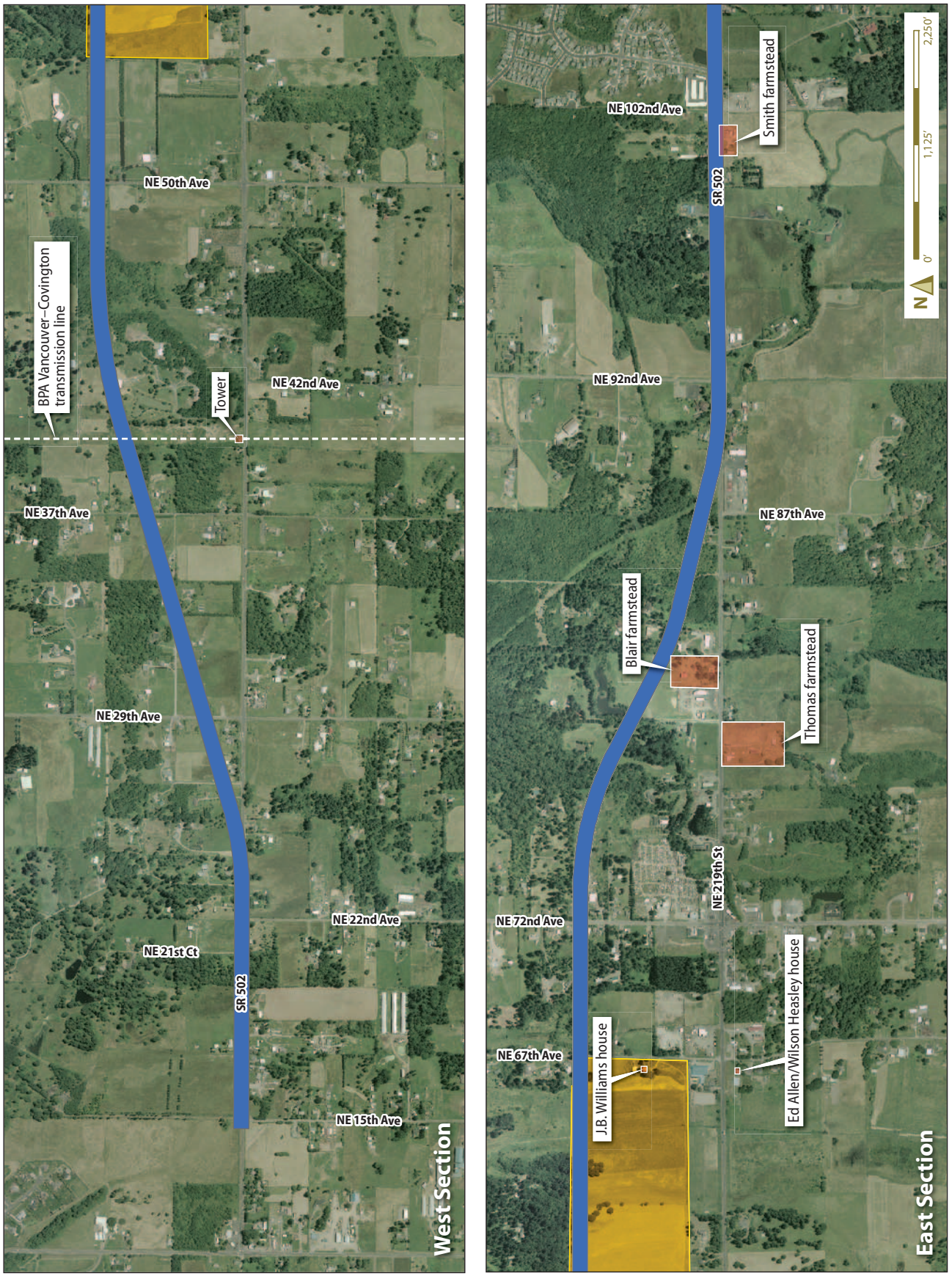

Exhibit 31: The Blue Alternative and Section 4(f) properties

- **Air quality:** The study area is in attainment for all National Ambient Air Quality Standards criteria pollutants, so it is considered to have air quality as good as or better than specified by these standards. Modeling shows that the alternatives would not cause a violation of the applicable National Ambient Air Quality Standards, and future carbon monoxide levels along the corridor are expected to be similar to today's levels. The alternatives are not expected to have significant effects on levels of particulate matter since they would not result in substantial changes in the overall number of trips being made in the study area.
- **Visual quality:** The Blue Alternative could have visual impacts to Section 4(f) properties. Removal of the J.B. Williams house and the new alignment of the roadway along the northern property line would visually change the agricultural setting of this property. Removal of the barn on the Smith farmstead would change the agricultural setting of this farmstead. Vegetation around the property would also likely be altered. Similarly, construction of the new roadway through the Blair farmstead would slightly change the visual setting of this farm, even though the alternative would not cause impacts to the structures.
- **Noise:** The Blue Alternative would likely cause increased noise levels for the structures on Blair farmstead because the new roadway would run on the north side of the structures, and the existing roadway, which would be retained as a local road, would remain on the south side of the structures. Noise levels would also be expected to increase slightly for the remaining structures of the Smith farmstead since the new roadway would be located closer to the house than its current alignment. However, the other remaining Section 4(f) properties (Ed Allen/Wilson Heasley house and Thomas farmstead) would not have noise impacts as the new roadway would be located further from them than the existing SR 502 alignment.
- **Water quality:** Stormwater detention and treatment and wetland mitigation are proposed for any of the build alternatives, which would result in no net change of water quality for the Section 4(f) properties.

The proximity impacts of the Blue Alternative will not result in a constructive use of any of the Section 4(f) properties.

4.7 How would the Aqua Off-Corridor Alternative affect Section 4(f) property?

The Aqua Alternative would cause impacts to three historic properties by creating a new roadway with a 150-foot right of way for the SR 502 off-corridor, running parallel to NE 219th Street to the south (see Exhibit 32). Direct impacts to these properties would include:

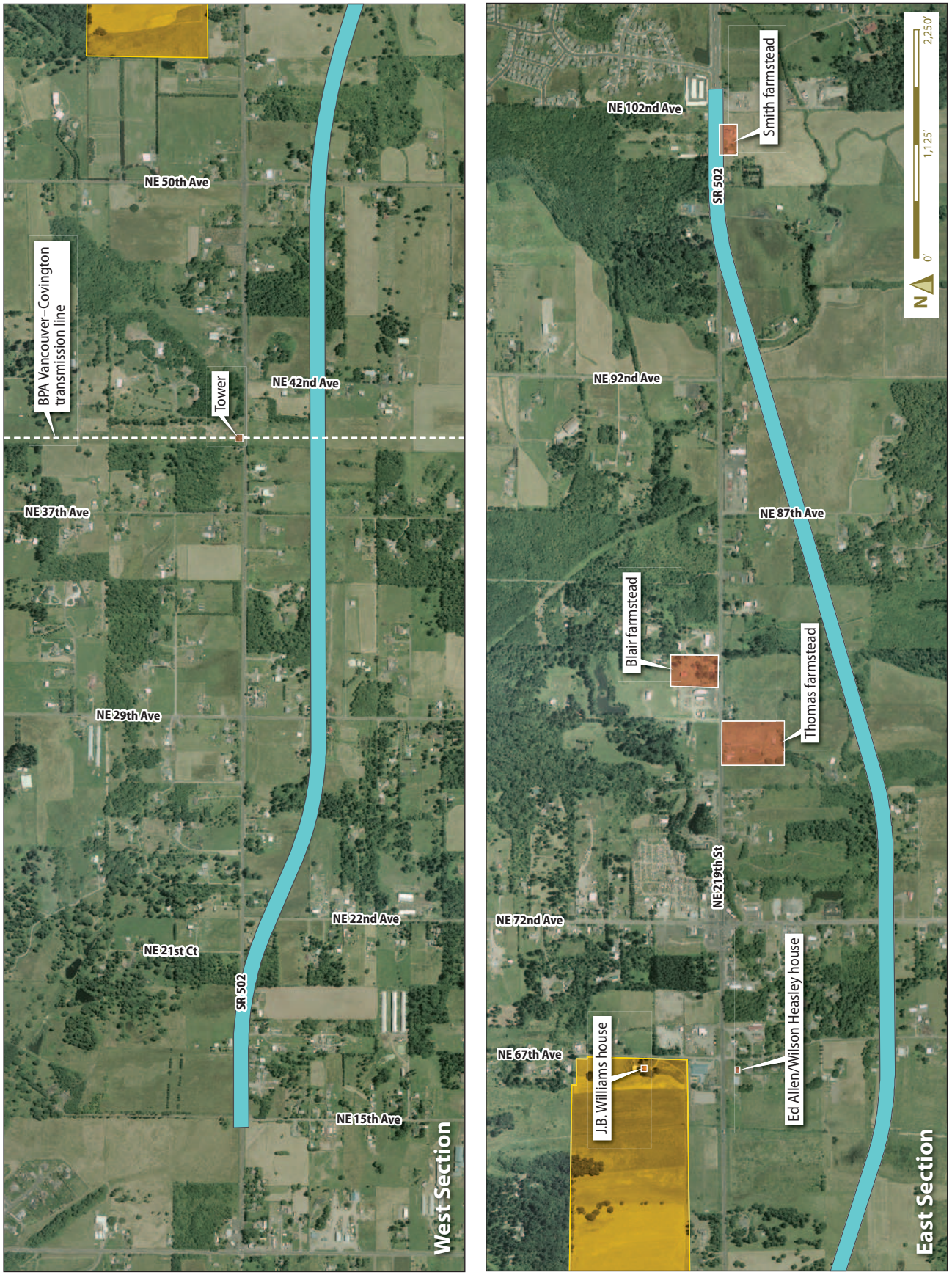

Exhibit 32: The Aqua Alternative and Section 4(f) properties

- **J.B. Williams house:** Like the other alternatives, the property that includes the J.B. Williams house would likely be acquired as a mitigation site, requiring removal of the house. Acquisition of the property would change the agricultural land use to a public use as a mitigation site, restoring the historic wetland and stream function as mitigation for the project's wetland and habitat impacts.
- **Thomas farmstead:** The Aqua Alternative would run through the parcel containing the Thomas farmstead, but the alignment would be south of the historic farmstead and its structures, so this would be a *de minimis* impact due to the change in the setting of the historic farmstead (if the Federal Highway Administration determined and the Washington State Department of Archaeological and Historic Preservation concurred that this is No Adverse Effect under Section 106). Acquisition of right of way on this property would change the agricultural land use to a transportation land use.
- **Smith farmstead**: This alternative would require removal of the barn, which is a contributing feature to the historic farmstead. Vegetation between the roadway and the farmstead structures would also be removed, altering the historic setting of the farmstead. Acquisition of right of way on this property would change the agricultural land use to a transportation land use.

This alternative would cross the Bonneville Power Administration Vancouver–Covington transmission line, further south than the on-corridor alternatives, but would not cause removal or relocation of any towers and therefore would have no impact. The Aqua Alternative would not affect the Ed Allen/Wilson Heasley house or the Blair farmstead, and therefore would avoid use of these Section 4(f) properties.

The Aqua Alternative would consolidate driveway accesses for the Smith farmstead. It would not change access for any of the other Section 4(f) properties, as none of their existing access points intersect the proposed alignment.

Proximity impacts that may occur to these historic properties include:

- **Air quality:** The study area is in attainment for all National Ambient Air Quality Standards criteria pollutants, so it is considered to have air quality as good as or better than specified by these standards. Modeling shows that the alternatives would not cause a violation of the applicable National Ambient Air Quality Standards, and future carbon monoxide levels along the corridor are expected to be similar to today's levels. The alternatives are not expected to have significant effects on levels of particulate matter since they would not result in substantial changes in the overall number of trips being made in the study area.

- **Visual quality:** The Aqua Alternative could have visual impacts to Section 4(f) properties. Removal of the J.B. Williams house and the barn on the Smith farmstead would visually change the agricultural setting of these properties. Vegetation around the property would also likely be altered. Similarly, construction of the new roadway through the parcel containing Thomas farmstead would cause a minor change to the visual setting of this farm, even though the alternative would not cause impacts to the structures.
- **Noise:** The Aqua Alternative would likely cause increased noise levels for the structures on Thomas farmstead because the new roadway would run on the south side of the structures, and the existing roadway, which would be retained as a local road, would remain on the north side of the structures. Noise levels would also be expected to increase slightly for the remaining structures of the Smith farmstead since the new roadway would be located closer to the house than its current alignment. However, the other remaining Section 4(f) properties (Ed Allen/Wilson Heasley house and Blair farmstead) would not have noise impacts as the new roadway would be located further from them than the existing SR 502 alignment.
- **Water quality:** Stormwater detention and treatment and wetland mitigation are proposed for any of the build alternatives, which would result in no net change of water quality for the Section 4(f) properties.

The proximity impacts of the Aqua Alternative will not result in a constructive use of any of the Section 4(f) properties.

4.8 How would the Transportation System Management/ Transportation Demand Management Alternative affect Section 4(f) property?

The Transportation System Management/Transportation Demand Management Alternative would not directly cause impacts to any historic properties. Improvements proposed under this alternative would be fully constructed within the existing right of way boundaries, so no land use changes would occur either.

The Transportation System Management/Transportation Demand Management Alternative would change access points to properties located adjacent to SR 502 including access to the Bonneville Power Administration Vancouver–Covington transmission line; relocation of the driveway access from SR 502 to NE 82nd Avenue for the Blair farmstead; relocation of the driveway access from SR 502 to NE 67th Avenue for the Ed Allen/Wilson Heasley house; and consolidation of driveway accesses for the Thomas farmstead and the Smith farmstead. It would not change access for any of the J.B. Williams house, as its existing access points do not intersect SR 502.

Proximity impacts that may occur to historic properties include:

- **Air quality:** The study area is in attainment for all National Ambient Air Quality Standards criteria pollutants, so it is considered to have air quality as good as or better than specified by these standards. Modeling shows that the alternatives would not cause a violation of the applicable National Ambient Air Quality Standards, and future carbon monoxide levels along the corridor are expected to be similar to today's levels. The alternatives are not expected to have significant effects on levels of particulate matter since they would not result in substantial changes in the overall number of trips being made in the study area.
- **Visual quality:** The Transportation System Management/ Transportation Demand Management Alternative could have minor visual impacts to Section 4(f) properties. Expansion of the roadway within the existing right of way would require removal of vegetation within the existing right of way between the roadway and the Ed Allen/Wilson Heasley house, the Thomas farmstead, the Blair farmstead, and the Smith farmstead.
- **Noise:** The Transportation System Management/Transportation Demand Management Alternative would not be likely to cause increased noise levels for any of the Section 4(f) properties as the roadway would not be located any closer to these structures than the existing roadway.
- **Water quality:** Stormwater detention and treatment and wetland mitigation would likely be constructed due to the increase in impervious surface resulting from improvements in the right of way. Treatment and mitigation would result in no net change of water quality for the Section 4(f) properties.

The proximity impacts of the Transportation System Management/ Transportation Demand Management Alternative will not result in a constructive use of any of the Section 4(f) properties. This avoidance alternative is further evaluated in Section 6.2.

4.9 How would the No Build Alternative affect Section 4(f) property?

The No Build Alternative would not directly cause impacts to any historic properties. No improvements are proposed under this alternative, so there would be no expansion of right of way or other changes made to the existing facility. The No Build Alternative would not change access points to any properties.

Proximity impacts that may occur to historic properties include:

- **Air quality:** The study area is in attainment for all National Ambient Air Quality Standards criteria pollutants, so it is considered to have air quality as good as or better than specified by these standards. Modeling shows that the alternatives would not cause a violation of the applicable National Ambient Air Quality Standards, and future carbon monoxide levels along the corridor are expected to be similar to today's levels. The alternatives are not expected to have significant effects on levels of particulate matter since they would not result in substantial changes in the overall number of trips being made in the study area.
- **Visual quality:** The No Build Alternative would not be expected to cause any visual changes to Section 4(f) properties as the existing facility would continue to be used in its current state.
- **Noise:** The No Build Alternative would not be likely to cause increased noise levels for any of the Section 4(f) properties as the roadway would remain in it current location.
- **Water quality:** Stormwater would remain untreated under the No Build Alternative and would continue to discharge as it does under existing conditions. This has a negative effect on water quality for the Section 4(f) properties.

The proximity impacts of the No Build Alternative will not result in a constructive use of any of the Section 4(f) properties. This avoidance alternative is further evaluated in Section 6.1.

5 Measures to minimize harm

5.1 How have any impacts to Section 4(f) property been minimized?

Impacts to the Section 4(f) properties have been minimized during the design and development of the alternatives. These minimization measures are summarized for each of the Section 4(f) properties as follows:

5.1.1 Bonneville Power Administration Vancouver–Covington transmission line

Design modifications were made to narrow the right of way width by seven feet for the Proposed Action to avoid causing impacts to the Bonneville Power Administration Vancouver–Covington transmission line tower on the north side of the existing SR 502 alignment. This change could also be made on the Purple and Red/Brown alternatives, thereby avoiding use of this Section 4(f) property. The shift in alignment for the Yellow Alternative would have to be greater since the right of way is aligned further north on that alternative; however, such a shift could likely be incorporated to avoid use of the property.

5.1.2 Ed Allen/Wilson Heasley house

The alignment of the Proposed Action is located far enough north that it would not cause impacts to the Ed Allen/Wilson Heasley House. Furthermore, the amount of right of way acquisition needed from the north and east edges of the parcel has been limited. This is also true for the Purple Alternative, and the White Alternative could potentially be shifted further north to avoid removal of the adjacent outbuilding and to maintain more distance between the roadway and the house.

5.1.3 J.B. Williams house

Removal of the J.B. Williams house is likely to be unavoidable under any of the alternatives other than the Transportation System Management/Transportation Demand Management and No Build alternatives, as the entire Williams parcel, including the portion upon which the house is located, would likely be used as a mitigation site for project effects to wetlands and biological resources. The house site would be part of the larger wetland buffer. The mitigation plan would return the entire farm site to pre-settlement/ pre-agricultural conditions, with an active, healthy vegetated stream and floodplain area, forested uplands (mixed oak woodlands), and forested wetlands on the western portions of the site. The area around the location of the home would be restored to a mixed oak woodland. Mitigation measures that may further reduce impacts to the J.B. Williams house – including relocating the house – are described in Section 5.3.

5.1.4 Thomas farmstead

Impacts to the Thomas farmstead are unavoidable under the Proposed Action and the Yellow, Purple, and White alternatives, unless more severe effects to the Blair farmstead would be undertaken. The Blair farmstead and the Thomas farmstead, located on opposite sides of the roadway, are too close in distance to "thread" the roadway between the properties and avoid effects to both Section 4(f) properties. Mitigation measures that may further reduce impacts to the Thomas farmstead are described in Section 5.3.

The Aqua Alternative could potentially be shifted such that the roadway alignment would not require removal of the barn on the Thomas farmstead or directly affect the historic farmstead; however, the roadway would still cross the parcel on which the farmstead is located, changing the setting and resulting in a *de minimis* impact (if the Federal Highway Administration determined and the Washington State Department of Archaeological and Historic Preservation concurred that this is No Adverse Effect under Section 106).

5.1.5 Blair farmstead

The roadway of the Proposed Action was shifted south to avoid the house and other structures on the Blair farmstead and to minimize removal of vegetation between the structures and the roadway. Furthermore, steeper slopes (4 to 1 dimension, rather than the typical 6 to 1 dimension) can be utilized for the roadside ditch to reduce the amount of vegetation removal.

A southerly shift and steeper slopes also could be applied to the Purple and Yellow alternatives. However, the roadway shift to minimize the impact on the Blair farmstead would be linked to the roadway effects on the Thomas farmstead, which is on the south side of SR 502 less than one-quarter mile west. The width of the roadway and ditch improvements to the Proposed Action and the Yellow, Purple, and White alternatives make it impossible to avoid or have no adverse effect on both the Blair and Thomas farmsteads.

The Red/Brown and Blue alternatives could be shifted north to avoid cutting through the northeast corner of the historically significant Blair farmstead, however, both alternatives would still require right of way acquisition from the parcel and result in a change of setting to the farmstead, resulting in a *de minimis* impact (if the Federal Highway Administration determined and the Washington State Department of Archaeological and Historic Preservation concurred that this is No Adverse Effect under Section 106).

5.1.6 Smith farmstead

Impacts to the Smith Farmstead are unavoidable under any of the alternatives other than the Transportation System Management/ Transportation Demand Management and No Build alternatives because of the proximity of this property to the eastern terminus of the project and the need to tie the widened or realigned roadway into the existing City of Battle Ground street improvements, which begin at NE 102nd Avenue. The barn on the Smith Farmstead is located close to the existing right of way and would require removal under any of the alternatives except the No Build and the Transportation System Management/Transportation Demand Management alternatives. Mitigation measures that may further reduce impacts to the Smith Farmstead – including relocating the barn and design modifications to avoid removal of the barn – will be investigated and are discussed in Section 5.2.

5.2 How can any impacts to Section 4(f) property be further mitigated?

Under the requirements of 49 USC Section 303, impacts on Section 4(f) properties that cannot be avoided must be minimized, or mitigated, to the greatest possible extent. The combination of these measures would result in a reduction in the effect to the historic properties. This section presents preliminary measures to mitigate or minimize harm that would occur to the J.B. Williams house, the Thomas farmstead, the Blair farmstead, and the Smith farmstead as a result of the Proposed Action.

A mitigation plan will be developed to address the unavoidable impacts of the Proposed Action. The mitigation plan will be included in the project's final environmental impact statement. Mitigation measures that could be implemented to rectify, reduce, or compensate for the use of the historic properties may include, but are not limited to, the following:

- In consultation with the Washington State Department of Archaeology and Historic Preservation, Washington State Department of Transportation could follow the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation, and shall conform to the standards and guidelines of the National Park Service Historic American Buildings Survey.
- Assess whether the J.B. Williams House is structurally sound and whether it could be moved to an alternate location. If so, consider marketing the home for a limited length of time (e.g. 90 days). Washington State Department of Transportation could negotiate to move the house to another location or market the house to potential purchasers. If the house is found not to be structurally sound or otherwise cannot be relocated or does not sell within the specified time frame, the house would be demolished in accordance with Washington State Department of Transportation policies.
- Investigate whether the J.B. Williams house could be made habitable and safe, including whether a septic system meeting County health standards could be installed. If so, consider marketing the home for a limited length of time (e.g. 90 days) on a 20-acre parcel with a conservation easement over 18–19 acres for use by Washington State Department of Transportation as part of the mitigation site.
- Assess whether the house on the Thomas farmstead is structurally sound and whether it could be moved to an alternate location on the property. If moving the house is found to be feasible, Washington State Department of Transportation could provide the land owners with the option to move the house. If the house is moved, consider creating a covenant that would restrict future land owners from demolishing the historic structure. If the house cannot be moved

or the land owners choose not to have it relocated, the house would be demolished in accordance with Washington State Department of Transportation policy.

- Vegetation, hedgerows, trees and/or a man made barrier could be used to provide visual screening from the roadway at the Blair farmstead. Since the introduction of barriers could constitute an introduction of a non-compatible element to the setting of a historic structure, barriers or retaining walls would be designed in consultation with Washington State Department of Transportation cultural and visual resources specialists and the Washington State Department of Archaeology and Historic Preservation historical architecture specialists.
- Investigate potential design modifications for the Proposed Action, such as narrowing the right of way width, that could be applied to avoid the removal of the barn on the Smith farmstead.
- Assess whether the barn on the Smith farmstead is structurally sound and whether it could be moved to an alternate location on the parcel. If moving the barn was found to be feasible, provide the land owners with the option to move the barn. If the barn is moved, consider creating a covenant that would restrict future land owners from demolishing the structure. If the barn cannot be moved or the land owners choose not to have it relocated, the barn would be demolished in accordance with Washington State Department of Transportation policy.
- Monetary compensation could be provided to historical societies or other entities for the loss of historic properties and used for interpretive purposes or to rehabilitate a similar local historic landmark buildings.
- Off-site mitigation, including historical interpretations and exhibits at local museums and historical societies on local farms and dairies, could be done to compensate for the loss of historic properties.
- The salvaging of architectural materials from the house on the Thomas farmstead, the J.B. Williams house, or the Smith farmstead barn could be done if the structure(s) cannot be moved and would require demolition.

6 Avoidance alternatives

As demonstrated in the following sections, the only two avoidance alternatives (that avoid the use of any Section 4(f) property) are the No Build Alternative and the Transportation System Management/ Transportation Demand Management Alternative, and neither of these alternatives is a feasible and prudent avoidance alternative (see definition in Section 1.1).

6.1 Is the No Build Alternative a feasible and prudent avoidance alternative?

The No Build Alternative, while technically feasible as it requires no additional design or construction, can be rejected as not prudent under the Section 4(f) standard. This alternative fails to meet the project's purpose and need of improving safety and mobility on SR 502. Under the No Build Alternative, by 2033 traffic volume is projected to triple in number, and travel times could triple or quadruple compared to today. Further, the No Build Alternative would not implement any new access management improvements – including a center median treatment and limited driveway access points – so it would not improve safety along the corridor. Chapter 3, *Comparison of the Alternatives – Safety and Mobility* of the draft environmental impact statement presents additional detail on the safety and mobility of the No Build Alternative and the Proposed Action.

The No Build Alternative would be expected to create extraordinary operational problems with intersections along the corridor operating at failing levels of service in 2015 and in 2033. These severe traffic problems could have ramifications for the economic viability of businesses along the corridor as well.

6.2 Are any other alternatives a feasible and prudent avoidance alternative?

The Transportation System Management/Transportation Demand Management Alternative is the only alternative, other than the No Build Alternative, that would avoid the use of Section 4(f) property.

As described in Section 2.3.8, improvements proposed under the Transportation System Management/Transportation Demand Management Alternative would be fully constructed within the existing right of way boundaries. For that reason, this alternative would avoid the use of Section 4(f) property, as no additional right of way acquisition would be required. As demonstrated in Section 4.9, its indirect proximity impacts are not so severe as to cause a constructive use.

Modeling of the Transportation System Management/Transportation Demand Management Alternative shows that the SR 502 Corridor will experience substantial delays at all intersections in the 2033 horizon, and show little or no improvements in the level of service as compared with the No Build Alternative under either alternative (with or without substantially expanded transit service). This design would result in a corridor that operates at grid lock conditions and would not result in substantial mobility or safety improvements, thereby failing to meet the purpose and need of the project, which means that this alternative, while technically feasible, fails as a feasible and prudent alternative for the project. More details on the analysis of the Transportation System Management/Transportation Demand Management Alternative can be found in Appendix Q, *Transportation Discipline Report* of the draft environmental impact statement.

7 Alternatives analysis and measures to minimize harm

7.1 Which of the build alternatives will cause the least overall harm?

Exhibit 33 presents a comparative analysis of impacts to Section 4(f) properties, which were analyzed in accordance with 23 CFR 774.3 for each alternative.

While the Red/Brown, Blue, and Aqua alternatives would have fewer impacts to Section 4(f) property than the Pink Alternative (Proposed Action), the Pink Alternative would require substantially fewer impacts to wetlands than those alternatives. The primary trade-offs in the selection of the Pink Alternative as the Proposed Action are the impacts to Section 4(f) property in exchange for much less extensive impacts to wetlands. Thus, as demonstrated in the Exhibit 33, the Pink Alternative causes the least overall harm to Section 4(f) properties and other resources not protected by Section 4(f).

Exhibit 33: Analysis of Alternatives

Alternative	Uses Section 4(f) property	Feasible and prudent	Impact to Section 4(f) property before minimization and mitigation	Net impact to Section 4(f) property after minimization and mitigation	Relative net harm to Section 4(f) property after mitigation	Magnitude of impacts to resources not protected by Section 4(f)	Overall prudent alternative
Yellow	Yes	Yes	BPA transmission line (No Adverse Effect) J.B. Williams house (Adverse Effect) Blair farmstead (Adverse Effect) Smith farmstead (Adverse Effect)	J.B. Williams house (Adverse Effect) Blair farmstead (Adverse Effect) Smith farmstead (Adverse Effect)	Equal to Proposed Action	• Displace 11–17 businesses • Displace 15–25 residences • Mitigate 32–34 acres of wetland fill • 5 perpendicular stream crossings • No stream channel realignment • Disturbance of 1 high risk, 4 moderate risk, and 4 low risk potentially contaminated sites	More overall impacts to important resources than the Proposed Action
Purple	Yes	No	BPA transmission line (No Adverse Effect) J.B. Williams house (Adverse Effect) Thomas farmstead (Adverse Effect) Blair farmstead (Adverse Effect) Smith farmstead (Adverse Effect)	J.B. Williams house (Adverse Effect) Thomas farmstead (Adverse Effect)* Blair farmstead (No Averse Effect)* Smith farmstead (Adverse Effect)	Equal to Proposed Action	• Displace 8–14 businesses • Displace 14–24 residences • Mitigate 26–28 acres of wetland fill • 4 perpendicular stream crossings • 310 linear feet of stream channel realignment for parallel stream crossing, could degrade critical fish habitat • Disturbance of 1 high risk, 4 moderate risk, and 4 low risk potentially contaminated sites	More overall impacts to important resources than the Proposed Action
White	Yes	No	J.B. Williams house (Adverse Effect) Thomas farmstead (Adverse Effect) Smith farmstead (Adverse Effect)	J.B. Williams house (Adverse Effect) Thomas farmstead (Adverse Effect) Smith farmstead (Adverse Effect)	Equal to Proposed Action	• Displace 10–16 businesses • Displace 26–36 residences • Mitigate 21–23 acres of wetland fill • 4 perpendicular stream crossings • 400 linear feet of stream channel realignment for parallel stream crossing, could degrade critical fish habitat • Disturbance of 1 high risk, 4 moderate risk, and 4 low risk potentially contaminated sites	More overall impacts to important resources than the Proposed Action

Alternative	Uses Section 4(f) property	Feasible and prudent	Impact to Section 4(f) property before minimization and mitigation	Net impact to Section 4(f) property after minimization and mitigation	Relative net harm to Section 4(f) property after mitigation	Magnitude of impacts to resources not protected by Section 4(f)	Overall prudent alternative
Red/ Brown	Yes	No	BPA transmission line (No Adverse Effect) J.B. Williams house (Adverse Effect) Smith farmstead (Adverse Effect)	J.B. Williams house (Adverse Effect) Smith farmstead (Adverse Effect)	Lower impact than Proposed Action	• No business displacements, but bypasses Dollars Corner businesses • Displace 20–30 residences • Mitigate 45–47 acres of wetland fill • 5 perpendicular stream crossings • No stream channel realignment • Disturbance of 4 moderate risk and 5 low risk potentially contaminated sites	More overall impacts to important resources than the Proposed Action
Pink (Proposed Action)	Yes	Yes	J.B. Williams house (Adverse Effect) Thomas farmstead (Adverse Effect) Blair farmstead (Adverse Effect) Smith farmstead (Adverse Effect)	J.B. Williams house (Adverse Effect) Thomas farmstead (Adverse Effect) Smith farmstead (Adverse Effect)	Equal to Yellow, Purple, & White alternatives	• Displace 16–22 businesses • Displace 20–30 residences • Mitigate 8–12 acres of wetland fill • 5 perpendicular stream crossings • No stream channel realignment • Disturbance of 1 high risk, 4 moderate risk, and 4 low risk potentially contaminated sites	Least overall impacts to important resources
Blue	Yes	No	J.B. Williams house (Adverse Effect) Blair farmstead (No Adverse Effect) Smith farmstead (Adverse Effect)	J.B. Williams house (Adverse Effect) Blair farmstead (No Adverse Effect) Smith farmstead (Adverse Effect)	Lower impact than Proposed Action	• Displace 0–4 businesses and bypasses Dollars Corner businesses • Displace 17–27 residences • Mitigate 65–67 acres of wetland fill • 5 perpendicular stream crossings • 0 feet of stream channel realignment • Disturbance of 4 moderate risk and 4 low risk potentially contaminated sites	More overall impacts to important resources than the Proposed Action
Aqua	Yes	No	J.B. Williams house (Adverse Effect) Thomas farmstead (No Adverse Effect) Smith farmstead (Adverse Effect)	J.B. Williams house (Adverse Effect) Thomas farmstead (No Adverse Effect) Smith farmstead (Adverse Effect)	Lower impact than Proposed Action	• Displace 0–4 businesses and bypasses Dollars Corner businesses • Displace 7–17 residences • Mitigate 69–71 acres of wetland fill • 5 perpendicular stream crossings • 0 feet of stream channel realignment • Disturbance of 24 moderate risk and 3 low risk potentially contaminated sites	More overall impacts to important resources than the Proposed Action

Alternative	Uses Section 4(f) property	Feasible and prudent	Impact to Section 4(f) property before minimization and mitigation	Net impact to Section 4(f) property after minimization and mitigation	Relative net harm to Section 4(f) property after mitigation	Magnitude of impacts to resources not protected by Section 4(f)	Overall prudent alternative
TSM/TDM	No	No	None	None	Least impact of alternatives considered	• No business displacements • No residential displacements • No wetland mitigation required • 5 perpendicular stream crossings • No stream channel realignment • No disturbance of potentially contaminated sites	Less overall impact than the Proposed Action, but not prudent
No Build	No	No	None	None	Least impact of alternatives considered	• No business displacements • No residential displacements • No wetland mitigation required • 5 perpendicular stream crossings • No stream channel realignment • No disturbance of potentially contaminated sites	Less overall impact than the Proposed Action, but not prudent

*Mitigation could also be taken to reduce the Thomas Farmstead to No Adverse Effect; however, the Blair Farmstead would then be an Adverse Effect. Because of the close proximity of these two properties, it is not possible to avoid removal of any structures on both properties.

8 Mill Creek North basin mitigation site evaluation

8.1 Mitigation site purpose and need

The Proposed Action would require a variety of impacts to environmental resources to construct the project, including adverse effects to wetlands and streams in the headwaters of the Mill Creek North basin. The impacted wetlands include Category I wetlands, which are considered to be of the highest ecological value. Category I wetlands demonstrate important water quality benefits, provide significant hydrological functions, including flood storage, and provide critical wildlife habitat for a variety of species. The streams expected to be affected by the Proposed Action include stretches of designated critical fish habitat.

The purpose for the mitigation site is to provide a combination of in-kind wetland rehabilitation and creation that meets the federal, state, and local mitigation requirements for the effects of the Proposed Action and to provide rehabilitation and/or creation of critical fish habitat.

The mitigation site is needed, and is actually required, to address the adverse effects of the Proposed Action on wetlands and streams.

This section of the draft Section 4(f) evaluation identifies the specific characteristics needed for a potential mitigation site for the SR 502 Corridor Widening Project and identifies where mitigation sites could feasibly be located. The identified sites are first screened for their ability to meet the basic site requirements. Following this, a second-level evaluation identifies which sites could realistically be implemented as mitigation sites. This process identifies the mitigation sites which are both feasible and prudent.

The proposed mitigation site, referred to throughout this evaluation as "Site 2," includes an eligible Section 4(f) property which would have to be removed. Therefore, another site was identified for consideration, referred to throughout this evaluation as "Site 1," which is the avoidance alternative. Site 1 contains no Section 4(f) property that would be affected. Other avoidance alternatives were sought, as evidenced in the discussion of areas removed from consideration, however, none were found.

8.2 Evaluation approach

An avoidance alternative is feasible and prudent if it "does not cause other problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property." (23 CFR 774.17) An alternative is imprudent if it causes impact of "extraordinary magnitude" and involves "unique problems" or "unusual factors."

[Quotes from *Citizens to Preserve Overton Park v. Volpe*, 401 U.S. 402 (1971)]. In addition, the regulations state that, in evaluating the "importance of protecting the Section 4(f) resource," it is appropriate to consider "the relative value of the resource to the preservation purpose of the statute". The US Department of Transportation notes that:

> A sliding scale approach to the magnitude of harm is proposed, because it is appropriate to consider the value of the individual Section 4(f) property in context. For example, some historic sites are significant beyond doubt and are permanently protected. Such properties should be protected absent extraordinary problems with the avoidance alternatives. Other historic sites of less significance, or which are likely to be legally destroyed or developed by their owners in the near future, may be outweighed by relatively less severe problems with the avoidance alternatives. [71 Fed. Reg. 42,613 (July 27, 2006)]

An alternative is not feasible "if it cannot be built as a matter of sound engineering judgment." (23 CFR 774.17) Deciding whether an alternative is prudent requires the evaluation of a variety of factors which, singly or together, support a finding of imprudence. The definition states that:

(3) An alternative is not prudent if:
- (i) It compromises the project to a degree that is unreasonable to proceed with the project in light of its stated purpose and need;
- (ii) It results in unacceptable safety or operational problems;
- (iii) After reasonable mitigation, it still causes:
  - (A) Severe social, economic, or environmental impacts;
  - (B) Severe disruption to established communities;
  - (C) Severe disproportionate impacts to minority or low-income populations; or
  - (D) Severe impacts to environmental resources protected under other Federal statutes;
- (iv) It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;
- (v) It causes other unique problems or unusual factors; or
- (vi) It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.(23 CFR 774.17)

8.3 Basic site requirements

In order to meet the mitigation site purpose and need, addressing the affects of the Proposed Action, the mitigation site must have the following characteristics:

- Located in headwaters of the Mill Creek North basin, where the Mill Creek North stream begins, so that the impacts can be mitigated within the same landscape position in the same basin. The extent of the headwaters area is confined to land of approximately the same elevation as the initial part of the stream.
- Provide at least 25.86 acres of degraded riparian headwater wetlands suitable for rehabilitation of stream-connected wetlands, and at least 5.97 acres suitable for creation of stream-connected wetlands plus buffer area for these wetlands, or another combination of rehabilitation and creation area that meets the federal, state, and local wetland requirement for the impacts of the Proposed Action.
- Provide in-kind similar function to the impacted riverine Category I wetlands. Mitigation for Category I wetlands must exhibit wetlands of sufficient size, in the appropriate landscape position, and appropriate hydrogeomorphic classification to provide water quality, hydrologic function, and wildlife habitat functions. The site must be directly connected to Mill Creek North or its floodplain to provide in-kind functions.
- Provide the opportunity for creation or rehabilitation of critical fish habitat to mitigate impacts of the Proposed Action on designated critical fish habitat.

8.4 Areas removed from consideration – areas not feasible or prudent for consideration

The only area in which a mitigation site can be located is within the Mill Creek North basin as shown in Exhibit 34. This is because all of the wetland impacts take place within this basin. However, several areas within the basin are not suitable as mitigation sites, and these areas are shaded as Areas 1 through 4 on Exhibit 34. The reasons for their lack of suitability are described below.

- **Area 1.** North of NE 244th Street, Mill Creek North flows through a deep forested ravine and the topography adjacent to the creek becomes very steep, as shown by the contour lines on Exhibit 34. This area is identified as Area 1 on Exhibit 34. Creation of Category I riverine wetlands directly connected to the creek in this area is not practicable due to the very steep slopes and extensive amount of excavation that would be required to create the acreage needed adjacent to the creek, removing significant amounts of mature riparian vegetation and potentially adversely affecting the creak through additional streambank degradation. Wetland rehabilitation is not practicable due to the relative lack of existing riverine wetlands in this area.

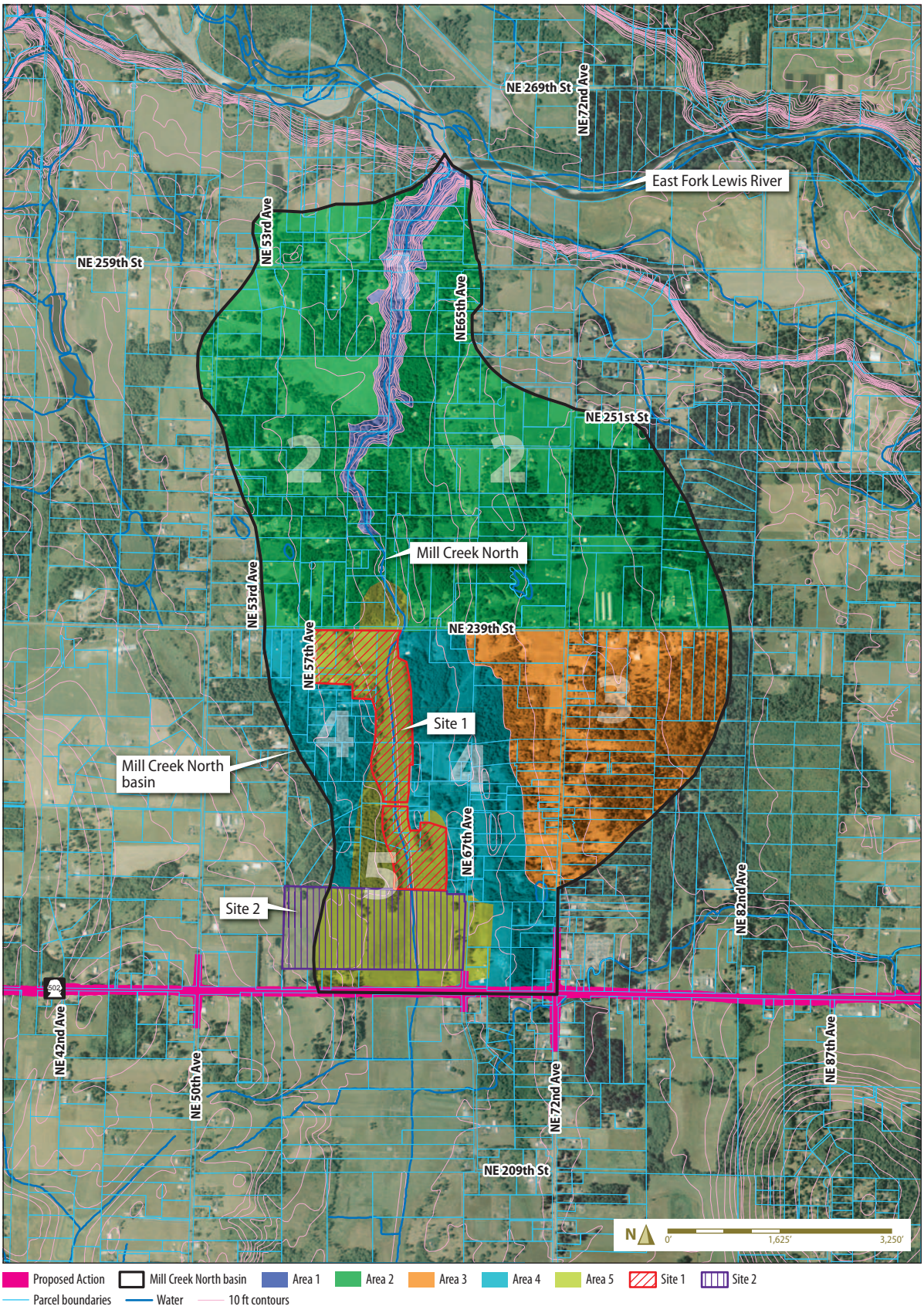

Exhibit 34: Areas considered as locations for mitigation sites within the Mill Creek North basin

The Proposed Action will affect wetlands and streams in the headwaters of the Mill Creek North basin. Headwater areas where streams originate are particularly important because they flow downstream into rivers and lakes. Most headwaters provide cold, clean water with abundant oxygen that supports a variety of fish species. This cold, clean water flows downstream into the main water bodies and contributes to the health of those larger waterbodies. In order to provide in-kind mitigation for the wetlands affected by the project, the selected mitigation site needs to be located within the headwaters of the Mill Creek North basin to best mitigate for the effects of the Proposed Action. Area 1 is located at the bottom (or downstream) area of the watershed, meaning that it would not be possible or practicable to provide similar headwater function in the same landscape position as the impacted wetlands in the upper portions of the watershed.

Therefore, this area would not provide a mitigation site that could meet the mitigation site purpose and need, and therefore, Area 1 was removed from consideration.

- **Area 2.** The land surrounding Area 1 north of NE 239th Street in the Mill Creek North basin is identified as Area 2 on Exhibit 34. Area 2 is composed of the forested upland terraces that are significantly higher in elevation (30 to 70 feet) than the Mill Creek North. Historically this area may have had isolated wetlands present, but the topography indicates that no stream-connected wetlands would have naturally existed in this area. Use of land in Area 2 as a mitigation site would require excavation of about 30 to 50 feet in depth in order to provide wetlands that connect to Mill Creek North. Excavation of this magnitude for more than 30 acres of wetland creation and mitigation is not practicable for construction of a mitigation site.

  Further, like Area 1, Area 2 is located downstream of the headwaters of the basin, so it is not situated in the correct landscape position for mitigation of the Category I headwater wetlands affected by the project. In addition, portions of Area 2 contain mature oak woodlands, which are a valuable and limited ecosystem type that supports an abundance of mammals, birds, reptiles, amphibians, and invertebrates with feeding, nesting, and breeding habitat. Oak woodlands are identified as a state priority habitat type. Many invertebrate species are found exclusively within this habitat type. Because oak woodlands are an important ecosystem component, it would not be appropriate to convert these areas to a different ecosystem type (wetlands) or to remove the trees, many of which are more than 150 years old.

As the aerial photo in Exhibit 34 illustrates, there is a utility corridor for a natural gas line which runs through many of the parcels in Area 2, and could logistically complicate the design of a mitigation site since excavation would be very restricted within the utility corridor. In addition, NE 72nd Avenue is a major road which runs through the eastern portion of Area 2 and could act as a barrier to hydraulic connectivity of wetlands within a mitigation site.

Therefore, this area would not provide a mitigation site that would meet the mitigation site purpose and need, and therefore, Area 2 was removed from consideration.

- **Area 3.** Land south of NE 239th Street in the eastern portion of the contributing basin is 10 to 40 feet higher in elevation than Mill Creek North. This area is identified as Area 3 on Exhibit 34. Like Areas 1 and 2, this land would require more excavation than areas with comparable elevations to the creek, and it is not located in the headwaters of the Mill Creek North basin.

  Like Area 2, portions of Area 3 are also not reasonable for consideration as a mitigation site because they contain oak woodlands, which are a valuable habitat type occurring in limited extent, and it would not be appropriate to convert these areas to a different ecosystem type. There is a utility corridor for a natural gas line which runs through many of the parcels in Area 3 and could complicate design of the mitigation site.

  In addition, most of Area 3 is the most urbanized portion of the watershed, and is developed as a rural residential area. NE 72nd Avenue runs through Area 3 and could act as a barrier to hydraulic connectivity of wetlands within a mitigation site. Further, Area 3 is divided into many small parcels with homes on them, most of the parcels only 5 acres in size, which would make locating a mitigation site in this area difficult without requiring a large number of residential relocations.

  Therefore, Area 3 would not provide a mitigation site that could meet the mitigation site purpose and need, and therefore, it was removed from consideration.

- **Area 4.** Land south of NE 239th Street in the western portion of the basin, identified as Area 4, contains the largest contiguous stands of mature oak woodlands. These woodlands are a valuable habitat type occurring in limited extent, and it would not be appropriate to convert these areas to a different ecosystem type for wetland mitigation because of the valuable ecosystem benefits these areas provide. Area 4 is slightly higher in topography than the creek, so additional excavation would be required in order to provide stream-connected wetlands.

Like Areas 2 and 3, Area 4 includes a utility corridor for a natural gas line, which would complicate design of a mitigation site in this area. Further, any mitigation site that would be located in Area 4 would be constrained by the proximity of the creek to the western edge of the Mill Creek North basin.

Therefore, Area 4 would not provide a mitigation site that would meet the mitigation site purpose and need, and therefore, it was removed from consideration.

8.5 Potential wetland mitigation sites

The elimination of Areas 1, 2, 3, and 4 leaves the remaining area along the headwaters portion of Mill Creek North, shown on Exhibit 34 as Area 5. Most of this area might be termed the "wetland contributing basin" for Mill Creek North, where stream-connected wetlands were historically present and fed into the creek. Rehabilitation of stream-connected wetlands could be feasibly implemented in Area 5. Area 5 also includes slightly more upland areas without oak woodlands where wetlands were not historically present, but where wetland creation could potentially occur if the created wetlands were connected to the rehabilitated stream-connected wetlands within Area 5.

Washington State Department of Transportation analyzed geographical information system data and performed field visits to identify potential sites for mitigation. Within Area 5, two potential mitigation sites were identified that could meet the basic site requirements outlined above, and therefore meet the mitigation site purpose and need:

- Site 1, consisting of portions of 14 parcels totaling 65.9 acres of land usable for mitigation activities (wetland rehabilitation, creation, and required buffers) located along Mill Creek North south of NE 239th Street and immediately north of Site 2 as shown in Exhibit 35. This site is bisected by a parcel that provides the only driveway access to a number of parcels located to the west of Site 1, which local homeowners rely upon to gain access to their residences.
- Site 2, consisting of a single 68.6-acre parcel (the J.B. Williams Parcel) located south of Site 1 in the headwaters of Mill Creek North as shown in Exhibit 36. One-fifth of this site (14 acres) is located outside of the Mill Creek North basin, but would be used for wetland mitigation activities in the adjacent basin.

8.6 Mitigation site evaluation of basic site requirements

Sites 1 and 2 were evaluated for their abilities to meet the basic site requirements outlined in Section 8.2 above. The results of this evaluation are summarized in Exhibit 35 and discussed in Sections 8.6.1 and 8.6.2.

Exhibit 35: Summary of basic site requirement evaluation

Basic site requirement screening criteria	Site 1	Site 2
Is site located in the same basin as the impacts (Mill Creek North)?	Yes	Yes
Does site provide 25.86 acres of wetland rehabilitation plus buffer (or combination with creation)?	Yes (23.3 ac)	Yes (26.7 ac)
Does site provide 5.97 acres of creation including buffer (or combination with rehabilitation)?	Yes (9.6 ac)	Yes (14.6 ac)
Will the site provide in-kind, similar function to Category I impacted riverine wetlands (headwater/floodplain)?	Yes	Yes
Is site directly connected to Mill Creek North or its floodplain?	Yes	Yes
Will the site provide opportunity to create/enhance essential fish habitat?	Yes	Yes

8.6.1 Evaluation of Site 1

- **Located in headwaters of the Mill Creek North basin, where the Mill Creek North stream begins, so that the impacts can be mitigated within the same landscape position in the same basin. The extent of the headwaters area is confined to land of approximately the same elevation as the initial part of the stream.**

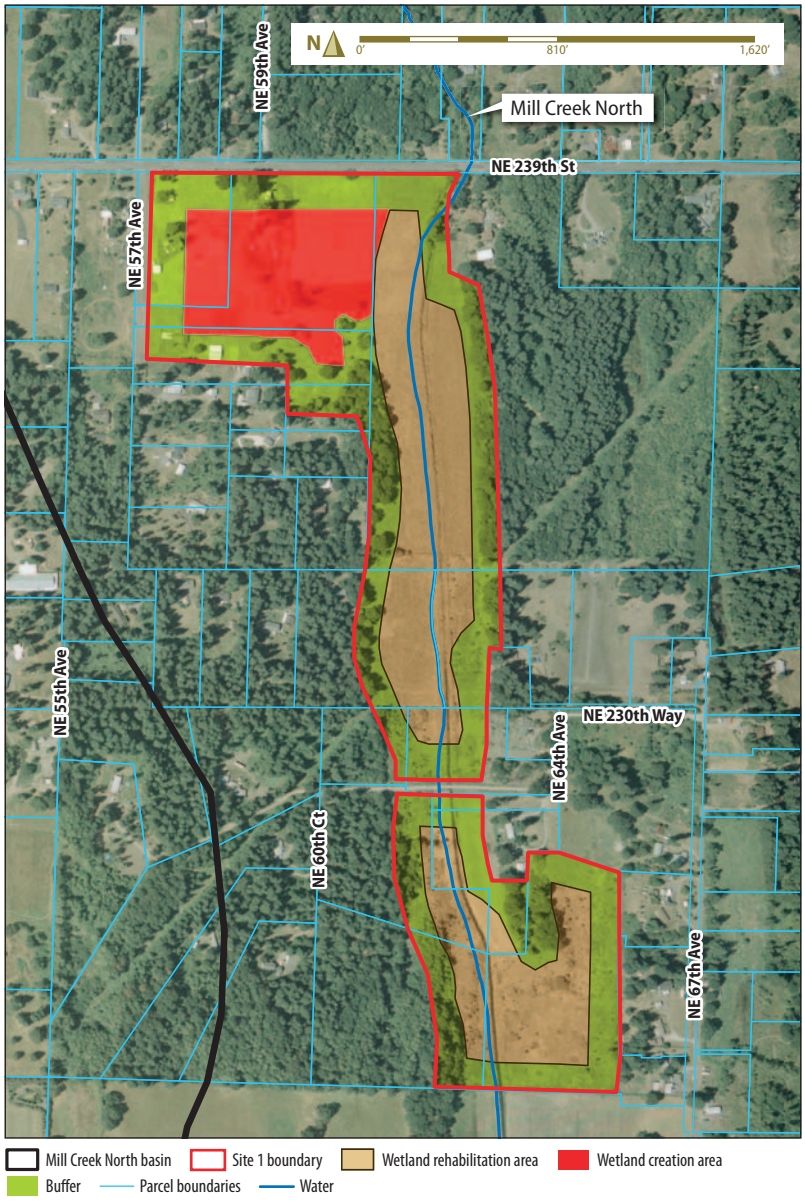

Exhibit 36: Site 1

Site 1 is located in the headwaters of the Mill Creek North basin and is therefore located in an appropriate landscape position for mitigation of the impacts of the Proposed Action.

- **Provide at least 25.86 acres of degraded riparian headwater wetlands suitable for rehabilitation of stream-connected wetlands and at least 5.97 acres suitable for creation of stream-connected wetlands plus buffer area for these wetlands, or another combination of rehabilitation and creation area that meets the federal, state, and local wetland requirement for the impacts of the Proposed Action.**

Site 1 can only provide 23.3 acres of wetland rehabilitation plus the required buffers due to the site constraints of wooded areas and residences adjacent to the site. This limitation on rehabilitation means that a total of 9.6 acres of wetlands

would need to be created in order to satisfy federal, state, and local mitigation requirements. Site 1 is able to accommodate this 9.6 acres of wetland creation plus the required buffers. Therefore, this site meets the required acreage for wetland rehabilitation and creation and would provide the needed buffers around these areas.

- **Provide in-kind similar function to the impacted riverine Category I wetlands. Mitigation for Category I wetlands must exhibit wetlands of sufficient size, in the appropriate landscape position, and hydrogeomorphic classification to provide water quality, hydrologic function, and wildlife habitat functions. The site must be directly connected to Mill Creek North or its floodplain to provide in-kind functions.**

  Category I riverine wetlands demonstrate a host of unique characteristics. These wetlands are connected to streams, in this case Mill Creek North, which means they have the potential to improve water quality by slowing surface water flow with depressions, seasonal ponding, and providing filtration through wetland vegetation. Category I wetlands are also distinguished by their ability to provide important hydrologic functions that reduce flooding and stream degradation through their ability to capture and store a large portion of the surface water falling in the basin. Finally, Category I wetlands provide critical habitat functions for a variety of fish and wildlife through their vegetation structure and richness, their types of water regimes, interspersion of vegetation types, connectivity to other habitat areas, and other special habitat features such as large woody debris and standing snags.

  The wetlands identified for rehabilitation within Site 1 are located within the floodplain and are connected to Mill Creek North. Currently, they are in degraded condition, so they fail to provide the full benefits of Category I wetlands in their existing state. However, if appropriately rehabilitated, these wetlands could provide the water quality, hydrologic functions, and wildlife habitat that characterize properly functioning, high quality Category I wetlands. Similarly, the wetlands that would be created in Site 1 would connect to the rehabilitated wetlands and Mill Creek North, and they could also be designed to provide Category I wetland functions. Therefore, Site 1 meets the basic site requirement for providing similar in-kind Category I wetland functions.

- **Provide the opportunity for creation or rehabilitation of critical fish habitat to mitigate impacts of the Proposed Action on designated critical fish habitat.**

Mill Creek North runs through Site 1. The stream banks of the creek are degraded through this area, and the creek has been straightened and ditched for agricultural purposes. This presents an opportunity for rehabilitation of fish habitat through stream enhancement projects such as riparian plantings and creating stream meanders. Therefore Site 1 meets the requirement to provide the opportunity for mitigation of critical fish habitat.

8.6.2 Evaluation of Site 2

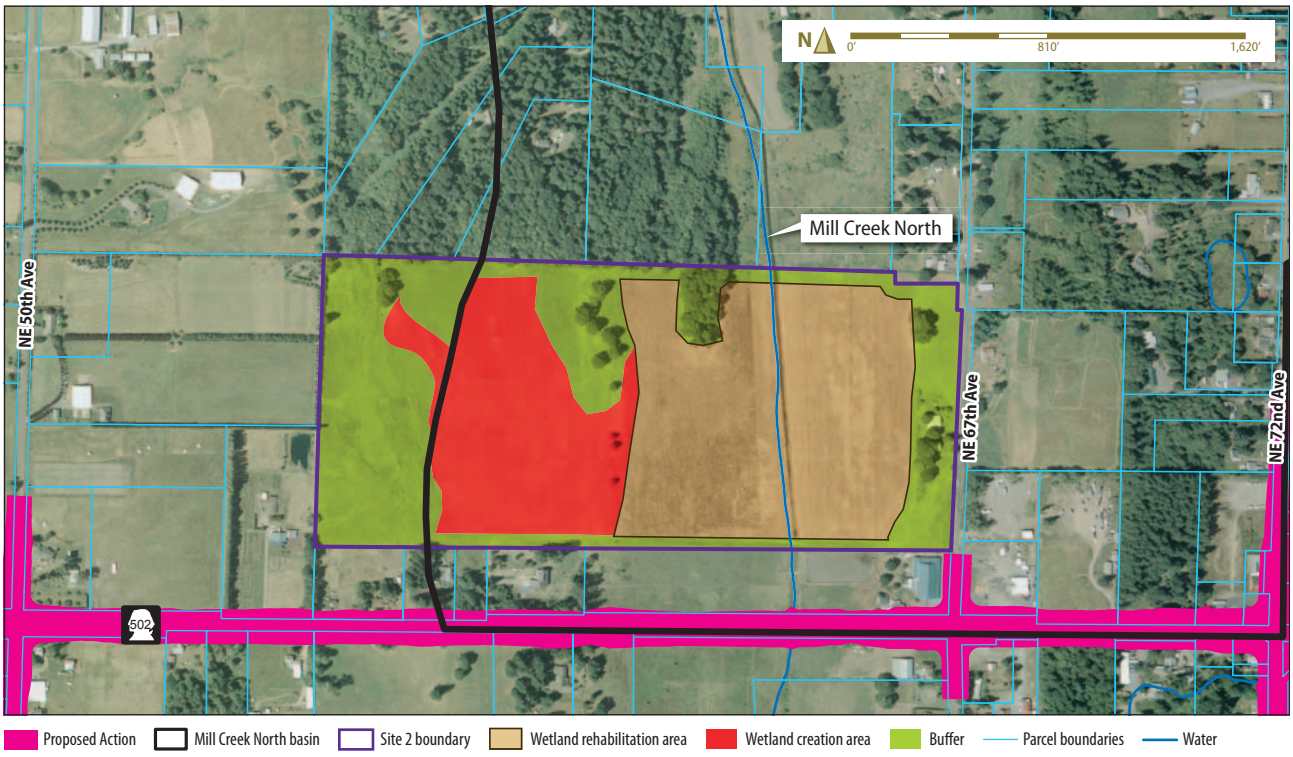

Exhibit 37: Site 2

- **Located in headwaters of the Mill Creek North basin, where the Mill Creek North stream begins, so that the impacts can be mitigated within the same landscape position in the same basin. The extent of the headwaters area is confined to land of approximately the same elevation as the initial part of the stream.**

  Mill Creek North originates just upstream of Site 2, so Site 2 is located in the headwaters of the Mill Creek North basin, and is therefore located in an appropriate landscape position for mitigation of the impacts of the Proposed Action.

- **Provide at least 25.86 acres of degraded riparian headwater wetlands suitable for rehabilitation of stream-connected wetlands and at least 5.97 acres suitable for creation of stream-connected wetlands plus buffer area for these wetlands, or another combination of rehabilitation and creation area that meets the federal, state, and**

local wetland requirement for the impacts of the Proposed Action.

Site 2 provides 26.7 acres of wetland rehabilitation and well over the 5.97 acres of wetland creation that would be required, plus area for the buffers required by federal, state, and local agencies for Category I wetlands. Therefore, this site meets the required acreage for wetland rehabilitation and creation and would provide the needed buffers around these areas.

- **Provide in-kind similar function to the impacted riverine Category I wetlands. Mitigation for Category I wetlands must exhibit wetlands of sufficient size, in the appropriate landscape position, and hydrogeomorphic classification to provide water quality, hydrologic function, and wildlife habitat functions. The site must be directly connected to Mill Creek North or its floodplain to provide in-kind functions.**

  The wetlands identified for rehabilitation within Site 2 are located within the floodplain and are connected to Mill Creek North. Currently, they are in degraded condition, so they fail to provide the full benefits of Category I wetlands in their existing state. However, if appropriately rehabilitated, these wetlands could provide the water quality, hydrologic functions, and wildlife habitat that characterize properly functioning, high quality Category I wetlands. Similarly, the wetlands that would be created in Site 2 would connect to the rehabilitated wetlands and Mill Creek North, and they could also be designed to provide Category I wetland functions. Therefore, Site 2 meets the basic site requirement for providing similar in-kind Category I wetland functions.

- **Provide the opportunity for creation or rehabilitation of critical fish habitat to mitigate impacts of the Proposed Action on designated critical fish habitat.**

  Mill Creek North runs through Site 2. The stream banks of the creek are degraded through this area, and the creek has been straightened and ditched for agricultural purposes, reducing the quality of fish habitat and stranding fish after high water. This site presents an opportunity for rehabilitation of fish habitat through stream enhancement projects such as riparian plantings and creating stream meanders. Therefore Site 2 meets the requirement to provide the opportunity for mitigation of critical fish habitat.

8.6.3 Summary

As demonstrated in sections 8.6.1 and 8.6.2 and summarized in Exhibit 35, both Site 1 and Site 2 meet the basic site requirements, and therefore both meet the mitigation site purpose and need, and are feasible options as a mitigation site.

8.7 Evaluation criteria – test for prudence

Since both Site 1 and Site 2 meet the basic site requirements to address the mitigation site purpose and need, both sites were examined further to determine whether or not each is a reasonable alternative that can realistically be implemented. The evaluation criteria that test each of the sites for prudence include:

- Avoids residential or commercial displacements.
- Avoids disruption to community connectivity.
- Number of parcels needed for full or partial acquisition. Generally, acquisitions of large areas are most feasible when there are fewer parcels (and thus fewer acquisitions) required.
- Owners of the parcel(s) are willing to sell the needed portion of their property. It is Washington State Department of Transportation's policy not to condemn property for mitigation sites.
- The ratio of total acquisition area to wetland rehabilitation and creation area. The shape of the mitigation site is driven by a variety of features (topography, soil types, presence of oak woodlands, parcel boundaries, and location of homes). Linear sites will require more buffer area, and thus require the acquisition of a greater number of total acres in comparison with a mitigation site than minimizes "edges" and thus minimizes the amount of land are that must be purchased for buffer area.
- Level of construction, maintenance or operational costs associated with using the property as a mitigation site. For example, rehabilitation of an area that requires little excavation is relatively simple, low cost, and requires significantly less intensive establishment and maintenance to be a successful mitigation site, compared with creation efforts that can require extensive and costly excavation efforts and more intensive site establishment.

The results of the prudence test are summarized in Exhibit 38, and discussed in Sections 8.7.1 and 8.7.2.

Exhibit 38: Summary of test for prudence

Test for prudence evaluation criteria	Site 1	Site 2
How many residential or commercial displacements will the site require?	3	1
Level of disruption to community connectivity?	Medium	Low
Number of parcels needed for full or partial acquisition?	4 full, 10 partial	1 full, 0 partial
Are owners willing to sell the needed portions of their parcels?	Unknown	Yes
Total acres in Mill Creek North basin to be acquired?	65.9	56.1
Acres to be used for wetland rehabilitation and creation?	32.9	41.3
Ratio of total acquisition area to wetland rehabilitation and creation area?	2:1	4:3
Level of construction, maintenance, or operational costs?	Above normal	Normal

8.7.1 Evaluation of Site 1

- **Avoids the need for residential or commercial displacements.**

  The area proposed as Site 1 has been selected to avoid residential or commercial displacements to the extent possible; however, in order to achieve the needed acreage for wetland rehabilitation and creation, three residential displacements are unavoidable, which equates to the displacement of approximately nine people, based on an average household size of 3.0 persons.

- **Avoids disruption to community connectivity.**

  As noted above, three residences would have to be removed to use Site 1. These displacements could constitute a disruption to the community and affect community cohesion. If Site 1 were used as the mitigation site, fencing would be placed around the perimeter of the site to protect the buffer, wetland rehabilitation, and wetland creation areas. Construction of a fence around this extensive site would potentially introduce a new barrier between adjacent land owners, which could potentially disrupt informal interactions among them.

- **Number of parcels needed for full or partial acquisition. Generally, acquisitions of large areas are most feasible when there are fewer parcels (and thus fewer acquisitions) required.**

  Site 1 is composed of portions of 14 tax lots. Four of these would need to be full acquisitions, and the remaining 10 could likely be acquisitions of conservation easements over a portion of parcels if the property owners were willing. This is a large number of real estate acquisitions that all must successfully take place in order for this site to be a viable alternative. Although the acquisition cost for Site 1 is unknown, it is likely that it would be less cost-effective than a site comprised of fewer parcels. If any one of the sites were not available for acquisition, Washington State Department of Transportation would not be able to provide the total required wetland mitigation acreage. Therefore, because of the high risk of successfully closing on all of these real estate transactions and the difficulty associated with multiple full and partial acquisitions, this site may not be a reasonable alternative for consideration.

- **Owners of the parcel(s) are willing to sell the needed portion of their property. It is Washington State Department of Transportation's policy not to condemn properties for mitigation sites.**

  It is unknown whether any of the owners of the 14 tax lots that comprise Site 1 would be willing to sell the needed portions to Washington State Department of Transportation for use as a mitigation site. To the best of Washington State Department of

Transportation's knowledge, none of the properties were listed for sale at the time of site identification. Washington State Department of Transportation avoids condemnation of property for mitigation activities, so it would be critical that all property owners be willing to sell the needed areas in order for Site 1 to be considered as a viable mitigation site. The uncertainty of willing sellers, especially those with residential displacements, increases the risk associated with Washington State Department of Transportation's ability to successfully purchase all of the needed parcels and conservation easements to implement a mitigation site on Site 1.

- **The ratio of total acquisition area to wetland rehabilitation and creation area. The shape of the mitigation site is driven by a variety of features (topography, soil types, presence of oak woodlands, parcel boundaries, and location of homes). Linear sites will require more buffer area, and thus require the acquisition of a greater number of total acres in comparison with a mitigation site than minimizes "edges" and thus minimizes the amount of land are that must be purchased for buffer area.**

  The shape of Site 1 is a fairly linear as it follows Mill Creek North with added areas for wetland creation. The shape of this site is driven by the shape and width of the floodplain, the topography, the presence of oak woodlands on both sides of the creek, and the presence of homes scattered on the many parcels that comprise the site, leading to this unusually shaped mitigation site. Because Site 1 has a substantial amount of "edge," more buffer area must be included in the site in order to meet buffer requirements. This means that a total of 65.9 acres must be acquired for Site 1, which contains 32.9 acres of rehabilitated and created wetlands, a ratio of approximately 2:1. In the prudence test, this high ratio of acquisition area to usable area might constitute an "unusual factor."

- **Level of construction, maintenance or operational costs associated with using the property as a mitigation site. For example, rehabilitation of an area that requires little excavation is relatively simple, low cost, and requires significantly less intensive establishment and maintenance to be a successful mitigation site, compared with creation efforts that can require extensive and costly excavation efforts and more intensive site establishment.**

  Construction of Site 1 as a wetland mitigation site would not require extensive excavation, and therefore construction costs are expected to be fairly standard for a large mitigation site. However, Site 1 could potentially have elevated establishment, maintenance and operational costs for several reasons. Site 1 would have a large number of

neighboring property owners. This would necessitate maintaining many access points. The higher number of neighbors could also potentially lead to increased costs for enforcement of protection of the wetland areas – including a greater need for inspections, a higher risk of encroachments, and so forth. Washington State Department of Transportation must report monitoring data for 10 years following establishment of the mitigation site, and so enforcement and maintenance of the protection measures, such as fencing, would be critical to ensure that the mitigation site operates as designed.

Because Site 1 would cause social impacts through residential displacements and disruption to community connectivity; would result in a high risk acquisition package; would not likely be a cost-effective purchase due to the large number of parcels and unusual shape configuration; and could potentially have high maintenance and operation costs, it is therefore concluded that Site 1 is not a prudent alternative as a mitigation site.

8.7.2 Evaluation of Site 2

- **Avoids the need for residential or commercial displacements.**

  Site 2 includes a single residential structure which would likely have to be removed, so one residential displacement would occur, equating to the displacement of approximately three people. However, it should be noted that the house appears to be currently unoccupied and in disrepair.

- **Avoids disruption to community connectivity.**

  As noted above, few, if any, people would have to be moved to use this property as a mitigation site, limiting the disruption to the community. Use of Site 2 as a mitigation site would require fencing around the perimeter of the site to protect the buffer, wetland rehabilitation, and wetland creation areas. This parcel already has a fence around its perimeter that separates it from adjoining properties, so use of the existing fence or construction of a new fence would not change connectivity in the rural community.

- **Number of parcels needed for full or partial acquisition. Generally, acquisitions of large areas are most feasible when there are fewer parcels (and thus fewer acquisitions) required.**

  Site 2 is composed of a single 68.6-acre parcel. This would be a full acquisition of a single parcel, which would make it a very reasonable mitigation alternative with a high likelihood of a successful acquisition.

- **Owners of the parcel(s) are willing to sell the needed portion of their property. It is Washington State Department of Transportation's policy not to condemn properties for mitigation sites.**

  The owner of the single parcel that comprises Site 2 had the property listed for sale at the time of site identification, indicating a willingness to sell the land, which makes this a very prudent parcel to pursue as a mitigation site.

- **The ratio of total acquisition area to wetland rehabilitation and creation area. The shape of the mitigation site is driven by a variety of features (topography, soil types, presence of oak woodlands, parcel boundaries, and location of homes). Linear sites will require more buffer area, and thus require the acquisition of a greater number of total acres in comparison with a mitigation site than minimizes "edges" and thus minimizes the amount of land are that must be purchased for buffer area.**

  While this site is not a circle, which would minimize the site perimeter and therefore the amount of buffer area needed to the greatest extent possible, the regular shape of this mitigation site does minimize the area of land acquired for providing buffers. This parcel is extremely unusual in that it offers more than enough mitigation area to meet the needs of the Proposed Action. Although 14 acres of Site 2 are located within the adjoining basin, this area would also be used for mitigation in that basin and does not detract from the overall acquisition efficiency and cost-effectiveness of the site. Of the 56.2 acres that would be acquired within the Mill Creek North basin, 41.3 acres would be used for wetland rehabilitation and creation, resulting in a ratio of approximately 4:3.

  Site 2 does include approximately five acres which would not be used for wetland rehabilitation or creation. This area of the site, located in the center of the northern property boundary, contains a mature and intact stand of Oregon White Oak, a globally endangered plant community as well as several large, but isolated oaks. The excavated wetland creation area would be designed so as not to disturb the critical rooting zone of these oaks. While the area around the oaks would not be included in the wetland creation or rehabilitation area, it would be part of the buffer for the wetlands, and the area around the isolated oaks would be replanted as an oak woodland community. The presence of this rare vegetation community would add to the overall richness of this mitigation site.

- **Level of construction, maintenance or operational costs associated with using the property as a mitigation site. For**

example, rehabilitation of an area that requires little excavation is relatively simple, low cost, and requires significantly less intensive establishment and maintenance to be a successful mitigation site, compared with creation efforts that can require extensive and costly excavation efforts and more intensive site establishment.

Construction of Site 2 as a wetland mitigation site would not require extensive excavation, and therefore construction costs would be expected to be fairly standard for a site of this size. Ongoing establishment and maintenance costs are also expected to be fairly standard as there are no unusual site characteristics that would cause these costs to be elevated. The site is located directly adjacent to NE 67th Avenue, facilitating easy site access, and the property is already fenced, so new encroachments from the few neighboring property owners would not be expected.

Site 2 would not result in very many (if any) residential displacements, would not introduce a new disruption to community connectivity, would present a streamlined acquisition process of purchasing a single property from a willing seller, and would result in a cost-effective mitigation site, it is therefore concluded that Site 2 would be a prudent alternative as a mitigation site.

8.8 Use of Section 4(f) property

Historic properties on Sites 1 and 2 were identified in order to determine whether any Section 4(f) properties are located within the boundaries of these sites.

8.8.1 Historic properties in Site 1

There are only two structures within the boundaries of Site 1 that are greater than 50 years in age and could therefore potentially be considered historic properties. These two homes, located on parcels 17773 and 19467 (Clark County Assessor Serial Numbers 227825011 and 227831000), would not be eligible for listing on the National Register of Historic Places because both homes have been significantly altered from their original form, and therefore the architectural integrity of these homes has been diminished. Therefore, there are no Section 4(f) properties located within Site 1, and Site 1 is an avoidance alternative.

8.8.2 Historic properties in Site 2

The J.B. Williams house is described in detail in Section 3.2.3 of this report. As described there, the house on Site 2 is the J.B. Williams house, which has been determined to be eligible for listing on the National Register of Historic Places, so it is considered a Section 4(f) property. The J.B. Williams House would likely have to be removed in

order to use Site 2 as a mitigation site, and therefore Site 2 would not be considered an avoidance alternative.

8.8.3 Value of J.B. Williams house as a Section 4(f) property

As noted earlier in Section 8.2, and as described in the Federal Register comments to the updated Section 4(f) regulations, it is appropriate to consider the value of a Section 4(f) property when weighing the prudence of using a Section 4(f) property against the consequences and issues associated with using an avoidance alternative. The value of the J.B. Williams house could be considered questionable for the following reasons:

1. The house is not in good overall condition. It has been in disrepair for many years and may not be structurally sound, so it unknown whether or not this historic home could actually be retained or moved to an alternate location as a habitable, safe structure. Washington State Department of Transportation could not sell the home at fair market value if it is not habitable.
2. The house does not currently have a septic system that meets County standards. Due to the high groundwater levels and surrounding wetlands it is unknown whether a system that meets County health standards could feasibly be installed. Without a legal septic system present, the house is not considered habitable, and Washington State Department of Transportation would not be able to sell the house.
3. The R-20 zoning on this parcel requires a minimum parcel size of 20 acres. If the house were sold, it would have to be sold as part of a 20-acre parcel with a conservation easement over nearly the entire property (except approximately one to two acres for the house area), so that Washington State Department of Transportation could still use most of the 20-acre parcel as part of the mitigation site. It is unlikely that a purchaser would be willing to pay taxes on the entire 20-acre site.
4. If the J.B. Williams house was retained under Washington State Department of Transportation's ownership and Site 2 was modified to provide a buffer around the site, the house would have to be fenced off to reduce the agency's liability. Over time, this home, which is already in poor condition, would fall further into disrepair, which would negate the purpose of protecting historic resources under Section 4(f).
5. Given its diminished integrity and low-level of local historical significance, the loss of the J.B. Williams house can be mitigated through recordation and potentially salvaging building materials for reuse in other similar historical buildings.

Because of the questionable overall structural condition of the J.B. Williams house, its lack of a legal and functioning septic system, and the low likelihood that one could be installed, it appears that this house is likely uninhabitable and therefore presents a lower value Section 4(f) resource when considering the preservation purpose of the Section 4(f) statute.

8.9 Summary of prudence test and use of Section 4(f) property

The key differences between the two sites in this test and in their use of Section 4(f) property are summarized in Exhibit 38 and compared below:

1. **Number of parcels.** A large number of parcels would have to be fully or partially acquired for Site 1 in comparison to the single parcel that could be purchased from a known willing seller for Site 2. Obtaining agreement from all 14 property owners whose parcels comprise Site 1 could potentially be a logistical nightmare, making it an unrealistic option that carries a high level of risk. Without any one of those parcels, Site 1 would fail to meet the mitigation site purpose and need. Site 2, by comparison, offers a relatively straight forward transaction from a single property owner who already has the property listed for sale.
2. **Cost Effectiveness.** Due to the unusual shape of Site 1, resulting in a large amount of "edge" around the site, and the large number of adjacent property owners, use of Site 1 as a mitigation site would require purchasing more acres to be used as buffer area than would be needed for Site 2. Further, the establishment and maintenance costs associated with Site 1 are expected to be substantially higher than they would be for Site 2.
3. **Displacements.** Site 1 would require the displacement of three residences, approximately nine residents. By comparison, Site 2 would only result in one displacement of a home that appears to be unoccupied.
4. **Section 4(f) property.** Site 2 would require the use of a Section 4(f) property, whereas Site 1 is an avoidance alternative. While avoidance alternatives are generally preferred, use of Site 1 is not prudent for the reasons explained above, especially in the context of a Section 4(f) property of questionable condition and value. Therefore, in this circumstance, it is reasonable to conclude that the avoidance alternative is not the best solution.

This evaluation has demonstrated that although Site 1 is an avoidance alternative, it is not a feasible and prudent alternative for use as a mitigation site. Although Site 2 would require use of the J.B. Williams

house, weighing the value of the house as a Section 4(f) resource against the other severe problems associated with using Site 1 as the mitigation site, the impacts of Site 1 substantially outweigh the importance of protecting the Section 4(f) property on Site 2.

8.10 Planning to minimize harm

As described in Section 8.6.2, Site 2 provides excellent wetland and fish habitat mitigation opportunities. However, because use of this site would affect the J.B. Williams house, all possible planning must be incorporated into the Proposed Action to minimize harm to the Section 4(f) property.

As outlined in Section 5 of the Section 4(f) Evaluation, removal of the J.B. Williams house is likely under the Proposed Action; however, a mitigation plan will be developed to address this unavoidable impact. The mitigation plan will be included in the project's final environmental impact statement. Mitigation measures that could be implemented to rectify, reduce, or compensate for the use of the J.B. Williams house may include, but are not limited to, the following:

- In consultation with the Washington State Department of Archaeology and Historic Preservation, Washington State Department of Transportation could follow the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation, and shall conform to the standards and guidelines of the National Park Service Historic American Buildings Survey.
- Assess whether the J.B. Williams house is structurally sound and whether it could be moved to an alternate location. If so, consider marketing the home for a limited length of time (e.g. 90 days). Washington State Department of Transportation could negotiate to move the house to another location or market the house to potential purchasers. If the house is found not to be structurally sound or otherwise cannot be relocated or does not sell within the specified time frame, the house would be demolished in accordance with Washington State Department of Transportation policies.
- Investigate whether the J.B. Williams house could be made habitable and safe, including whether a septic system meeting County health standards could be installed. If so, consider marketing the home for a limited length of time (e.g. 90 days) on a 20-acre parcel with a conservation easement over 18–19 acres for use by Washington State Department of Transportation as part of the mitigation site.
- Monetary compensation could be provided to historical societies or other entities for the loss of historic properties and used for interpretive purposes or to rehabilitate a similar local historic landmark building(s).

- Off-site mitigation, including historical interpretations and exhibits at local museums and historical societies on local farms and dairies, could be done to compensate for the loss of the J.B. Williams house.
- The salvaging of architectural materials from the J.B. Williams house could be done if the structure(s) cannot be moved and would require demolition.

9 Coordination

Section 4(f) requires coordination with the official(s) that have jurisdiction over each Section 4(f) property prior to approving an alternative that does not avoid Section 4(f) property (23 CFR 774.3 (c)(iv). For the SR 502 Corridor Widening Project, the only official with jurisdiction over the Section 4(f) property is the Washington State Department of Archaeology and Historic Preservation. Coordination with the Washington State Department of Archaeology and Historic Preservation, the Washington State Department of Interior, and the Advisory Council on Historic Preservation is required under 23 CFR 774.5 for a determination of a *de minimis* impact on any Section 4(f) property.

Records research was conducted at the Clark County Museum and the Fort Vancouver Library. Other research materials reviewed included historical maps and other forms of data on file at Archaeological Investigations Northwest, Inc., Department of Archaeology and Historic Preservation, and Clark County Geographic Information System.

9.1 What coordination with state and federal entities has or will occur?

As described above, records from the Washington State Department of Archaeology and Historic Preservation were reviewed for information on historic properties in the study area. The Washington State Department of Archaeology and Historic Preservation concurred that the six historic properties described in Section 3.1 are eligible for listing on the National Register of Historic Places. Concurrence by the Washington State Department of Archaeological and Historic Properties with archaeological findings is pending. Copies of the concurrence letters received to date are included as attachments to this evaluation.

Any adverse effects to Section 106 resources will result in the preparation of a Memorandum of Agreement at a subsequent phase of the project, which would be included in the Final Section 4(f) Evaluation. The Washington State Department of Archaeology and Historic Preservation will be a signatory to the agreement, and the Advisory Council on Historic Preservation will be invited to participate.

9.2 What coordination with local historic societies has or will occur?

As described above, records from the Clark County Museum and Fort Vancouver Library were reviewed for information on historic properties in the study area. These parties, the Clark County Historic Preservation Commission, and the City of Battle Ground Historical Advisory Committee will receive copies of the draft environmental impact statement and draft Section 4(f) evaluation for comment. In addition, Washington State Department of Transportation will be coordinating with local historical societies on potential mitigation measures as the mitigation plans are developed. Documentation of any further coordination with local historic societies will be included as attachments to this evaluation.

10 Conclusion

As demonstrated in this Section 4(f) evaluation, the Pink On-Corridor Alternative, which is the Proposed Action, causes the least overall harm, while also meeting the purpose and need for the project.

The Proposed Action is a hybrid of the other on-corridor alternatives (Yellow, Purple, White, Red, and Orange) and the Transportation System Management/Transportation Demand Alternative that blends the best aspects of these alternatives, with its design carefully minimizing impacts to Section 4(f) property and those resources not protected by Section 4(f) to the extent possible, while still addressing the purpose and need of the project. The following design parameters are proposed as part of the Proposed Action in order to incorporate all possible planning to minimize harm or mitigate for adverse impacts to Section 4(f) property:

- The right of way was narrowed near the Bonneville Power Administration transmission line to avoid relocation or replacement of the tower located west of NE 41st Court.
- Right of way acquisition on the north and east edges of the parcel containing the Ed Allen/Wilson Heasley house has been limited, thus avoiding an impact to the historic house and minimizing removal of vegetation between the house and the roadway.
- Washington State Department of Transportation would commit to mitigation measures for the unavoidable impacts to the J.B. Williams house, the Thomas farmstead, and the Smith farmstead through a Memorandum of Agreement with the Washington State Department of Archaeology and Historic Preservation, in compliance with Section 106 of the National Historic Preservation Act. Proposed

mitigation measures are listed in Section 5.2.5.

- The roadway was shifted south to avoid the house and other structures on the Blair farmstead and to minimize removal of vegetation between the structures and the roadway.
- Steeper slopes (4 to 1 dimension) can be utilized for the roadside ditch adjacent to the Blair farmstead in order to reduce the amount of vegetation removal required and minimizing changes to the setting of the historic farmstead.

11 References

Archaeological Investigations Northwest, Inc. (AINW). 2008. *Cultural Resource Survey for the SR 502 Corridor Widening Project*. April 2008.

Archaeological Investigations Northwest, Inc. (AINW). 2009. *Cultural Resource Survey and Archaeological Site Evaluations for the SR 502 Corridor Widening Project.* April 2009/

Parsons Brinckerhoff. 2007. *First-Level Alternatives Screening Memorandum for the SR 502 Corridor Widening Project*. July 2007.

12 Attachments

Correspondence from coordinating parties, as described in Section 9, will be added upon receipt by Washington State Department of Transportation.

To date, the only correspondence received is the February 24, 2009 letter of concurrence from the Washington State Department of Archaeological and Historic Preservation regarding the National Register of Historic Places eligibility determinations.

STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

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February 24, 2009

Ms. Leslie Schwab
WSDOT Cultural Resources Specialist
Washington State Department Of Transportation
WSDOT-Mottman
P.O. Box 47332
Olympia, WA 98504-7332

In future correspondence please refer to:
Log: 091907-08-FHWA
Property: SR 502, Corridor Widening to Battle Ground
Re: More Information Needed

Dear Ms. Schwab:

Thank you for contacting our office. I have reviewed the historic property inventory forms you provided for this project. No archaeological resources or site forms were evaluated in this review. We concur with 85 of the determinations of eligibility made for this project. Of those we reviewed, we concurred with your consultant on the determinations of eligibility for the National Register of Historic Places on the following properties:

Vancouver-Covington Transmission System
- Allen-Heasley house
- Blair house

Thomas Farmstead
- Smith Farmstead
- JB Williams house

The remaining properties are not eligible with the following exceptions:

The Stone Archway
Evergreen Septic
- O'Brady's Drive in historic signage

For these properties additional cultural resource evaluation and better statements of significance would help us in our abilities to concur with the findings of your consultant.

I would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4) and the survey report when it is available. These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer pursuant to Section 106 of the National Historic

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Preservation Act and its implementing regulations 36CFR800. Please contact me should you have any specific questions about our request and we look forward to receiving this material.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov

Cc: Matthew Sterner (DAHP)

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